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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
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11 Susan Oster d/b/a/ Feral Jewelry, an
individual,

12 Plaintiff,

13 v.

14 Rainbow K Jewelry SAS, a French
15 joint-stock company; mytheresa.com
GmbH, a German entity; Schoola, Inc.
16 d/b/a/ Olivela.com, a Delaware
corporation; SoPicks, an Italian entity;
17 Eastward Bound Technology, Inc.
d/b/a/ Vugstyle, Inc., a Colorado
18 corporation; Last Resort, LLC, a
California company; and DOES 1-50,
19 inclusive,

20 Defendants.
21

Case No. 2:25-cv-04929 JLS (PDx)

**DECLARATION OF P. BRANKO
PEJIC IN SUPPORT OF PARTIES'
JOINT STIPULATION**

*Filed concurrently with Joint
Stipulation to Extend Defendant
Rainbow K's Time to Respond to First
Amended Complaint and Setting
Briefing Schedule and Hearing Date
for Defendant's Motion to Stay; and
(Proposed) Order*

Judge: Hon. Josephine L. Staton

22 I, P. Branko Pejic, declare as follows:

23 1. I am a partner with the law firm of Greenblum & Bernstein, P.L.C.,
24 counsel to Defendant Rainbow K Jewelry SAS, and I am a member in good standing
25 of the bars of the state of Arkansas and the District of Columbia as well as the U.S.
26 District Court for the District of Colorado, U.S. District Court for the Northern
27 District of Oklahoma, U.S. District Court for the District of Columbia, U.S. Court of
28 Appeals for the Federal Circuit and the U.S. Court of Appeals for the D.C. Circuit,

1 and there are no pending disciplinary proceedings against me in any state or federal
2 court. I have never been convicted of a felony, and I have never been censured,
3 suspended, disbarred, or denied admission or readmission by any court.

4 2. I make this declaration based upon my own personal knowledge, and if
5 called upon as a witness, I could and would competently testify to the matters stated
6 herein. I make this declaration in support of the parties' Joint Stipulation to Extend
7 Defendant Rainbow K's Time to Respond to First Amended Complaint and Setting
8 Briefing Schedule and Hearing date for Defendant's Motion to Stay.

9 3. During the time the Court extended Defendants' time to respond to the
10 Plaintiff's Complaint, the parties narrowed the issues resulting in the First Amended
11 Complaint (D.I. 54, "FAC") dropping the False Designation of Origin cause of
12 action.

13 4. Additional time is required for Defendant to study Plaintiff's newly
14 asserted U.S. Copyright Registration in the FAC.

15 5. Defendant understands that Plaintiff is serving the FAC on the new
16 defendants.

17 6. The parties' proposed briefing schedule reasonably respects the parties'
18 limited availability, including foreign clients, during the upcoming Holiday Season.

19 7. The proposed date to respond to the FAC reasonably reflects the
20 efficiencies and avoids potentially unnecessary pleadings and motion practice.

21 8. The parties will continue work together and discuss potential amicable
22 resolution to the instant disputes.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct.

25 Executed this 8th day of December 2025, at Reston, VA.

26 

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28 P. Branko Pejic